

**IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT
OF TEXAS, HOUSTON DIVISION**

ACA INTERNATIONAL

and

SPECIALIZED COLLECTION
SYSTEMS, INC.,

Plaintiffs,

v.

CONSUMER FINANCIAL PROTECTION
BUREAU; and ROHIT CHOPRA, in his
official capacity as Director of the Consumer
Financial Protection Bureau,

Defendants.

Case No. 4:25-cv-00094

**MOTION TO EXCEED PAGE LIMIT ON PLAINTIFFS' ACA INTERNATIONAL AND
SPECIALIZED COLLECTION SYSTEMS, INC.'S MOTION ON APPLICATION FOR
PRELIMINARY INJUNCTION AND TEMPORARY RESTRAINING ORDER**

Plaintiffs ACA International ("ACA") and Specialized Collection Systems, Inc. ("SCS") (collectively, "Plaintiffs") respectfully request this Court grant them permission to exceed the page limitation by ten (10) pages for their Motion on Application for Preliminary Injunction and Temporary Restraining Order ("Motion") for a combined total of thirty-five (35) pages. In support Plaintiffs state as follows:

1. Defendant Consumer Financial Protection Bureau (“CFPB or Bureau”) filed its Notice of Final Rulemaking on January 7, 2025, which was published in the Federal Register on January 14, 2025. *See* 90 Fed. Reg. 3276. The Notice advised of the implementation of a final rule on the Prohibition on Creditors and Consumer Reporting Agencies Concerning Medical Information (Regulation V) (the “Rule”).

2. Plaintiffs filed their Complaint on January 8, 2025.

3. Plaintiffs intend to file a preliminary injunction and temporary restraining order, enjoining the CFPB from enforcing the Rule and setting it aside in its entirety prior to its effective date on March 17, 2025.

4. The Rule spans 99 pages of the Federal Register, and Plaintiffs claim that it is in violation of the Administrative Procedure Act (“APA”) as excess of statutory jurisdiction, authority or limitations, or short of statutory right under 5 U.S.C. § 706(2)(C), in violation of the Major Questions Doctrine, arbitrary and capricious in violation of the APA under 5 U.S.C. § 706(2)(A), and a restriction of content-based speech, in violation of the APA under 5 U.S.C. 706(2)(B) and the first amendment of the U.S. Constitution. (*See generally*, Compl.)

5. This Court’s procedures have a general 25-page limit applicable to motions under Civil L.R. 7. Plaintiffs seek an extension of the page limits for its Motion to thoroughly address these substantial violations of Plaintiffs’ rights by the CFPB.

6. The Motion is made in good faith and is based on genuine need for the additional pages. No party will be prejudiced by the requested relief.

7. Plaintiffs sought to meet and confer about the instant motion and did not receive a reply from the CFPB or Director Rohit, moreover, no defendant has yet had counsel appear in

this matter.

For the foregoing reasons, the Plaintiffs respectfully request the Court issue an order granting them permission to exceed the page limitation for their Motion on Application for Preliminary Injunction and Temporary Restraining Order by ten (10) pages for a total of thirty-five (35) pages.

Dated: January 21, 2025

Respectfully submitted,

ACA INTERNATIONAL and SPECIALIZED
COLLECTION SYSTEMS, INC.

By its attorneys,

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/s/ Sarah J. Auchterlonie

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Certificate of Service

I certify that on January 21, 2025 I electronically filed the foregoing document(s) using the CM/ECF system and they are available for viewing and downloading from the Court's CM/ECF system, and I sent copies of the foregoing instrument by electronic mail, and caused them to be sent by U.S. Postal Service to the following:

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